

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:14CR00187 JAR
	)	
PAMELA TABATT,	)	
RICHARD GROSS, and	)	
PAUL BERRA, JR.,	)	
	)	
Defendants,	)	
	)	
EDNA MEJIA,	)	
OSCAR MEJIA,	)	
	)	
Third-Party Petitioners.	)	

**THE UNITED STATES' SECOND UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO RESPOND TO THIRD-PARTY PETITION**

Comes now, Plaintiff, United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Richard E. Finneran, Assistant United States Attorney for said District, and for its Motion states as follows:

1. On or about July 1, 2016, the United States of America obtained a Second Preliminary Order of Forfeiture, which included, in part, the following property (hereafter the "Subject Property"):

(a) Real Property at 114 Brookfield Boulevard, Wentzville, Missouri 63385; more particularly described as follows:

Lot 8 of Keeneland Trails Plat One, according to the plat thereof recorded in Plat Book 44 Page 45 of the St. Charles County Records, with all appurtenances, improvements and fixtures thereon;

Parcel ID: 4-0014-A221-00-0008.0000000

2. On or about September 14, 2016, Edna Mejia and Oscar Mejia (the “Petitioners”) filed an ancillary petition claiming ownership to the Subject Property (the “Petition”).

3. On September 15, 2016, the Honorable Court ordered that the United States shall file a response to the Petition by September 22, 2016.

4. On September 21, 2016, this Court granted the United states an extension of time up to and including October 6, 2016 in which to respond to the Petition.

5. Since that time, and indeed prior to the filing of the Petition, counsel for the United States has been engaged in discussions with Blake Hill, counsel for Petitioners, about the merits of and possible resolution of the instant matter. The undersigned counsel and Mr. Hill agree that an additional extension of time is in the mutual interest of the parties.

6. The United States therefore requests an additional extension of two weeks, up to and including October 20, 2016, to respond to the petition filed by Petitioners, in order to more fully review the issues at hand and continue its dialogue with counsel for Petitioners.

7. Prior to filing the instant request, counsel for the United States conferred with Blake Hill, counsel for Petitioners, who indicated he had no opposition to the United States’ being granted the relief requested herein.

WHEREFORE the United States respectfully request an additional two (2) weeks, up to and including October 20, 2016, to respond to Edna and Oscar Mejia's Petition for Ancillary Hearing.

Dated: October 4, 2016

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

/s/ Richard E. Finneran  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2016 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Richard E. Finneran  
RICHARD E. FINNERAN, #60768MO  
Assistant United States Attorney